

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA,	:	Docket No. 16-0045
	:	
Plaintiff,	:	
vs.	:	March 7, 2016
	:	
JASON COMEAUX,	:	
	:	
Defendant.	:	Lafayette, Louisiana

REPORTER'S OFFICIAL TRANSCRIPT OF THE TESTIMONY OF
SPECIAL AGENT SANDRA ZULLI HAD DURING THE PLEA HEARING
BEFORE THE HONORABLE DEE D. DRELL
UNITED STATES DISTRICT JUDGE

APPEARANCES:

FOR THE PLAINTIFF:	ALEXANDER C. VAN HOOK United States Attorney's Office 300 Fannin Street, Suite 3201 Shreveport, LA 71101-3068
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FOR THE DEFENDANT:	LAWRENCE C. BILLEAUD Attorney at Law 706 W. University Avenue Lafayette, LA 70506
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LARAE E. BOURQUE, RMR, CRR
Federal Official Court Reporter
800 Lafayette Street, Ste. 3103
Lafayette, LA 70501

I N D E X

WITNESS:

PAGE:

SPECIAL AGENT SANDRA ZULLI

Direct Examination by Mr. Van Hook..... 3

* * * * * E X C E R P T * * * * *

MR. VAN HOOK: Your Honor, the United States would call Special Agent Zulli.

THE COURT: All right. If you would return and raise your right hand again, please.

THE COURTROOM DEPUTY: Do you solemnly swear that the testimony you are about to give in this case will be the truth, the whole truth, and nothing but the truth, so help you God?

THE WITNESS: I do.

Whereupon,

SPECIAL AGENT SANDRA ZULLI
was called as a witness; after having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. VAN HOOK:

Q Would you please state your name and occupation.

A Sandra M. Zulli, Z-U-L-L-I. I'm a special agent with the FBI.

Q And how long have you been a special agent?

A Twenty years.

Q In your work as a special agent, are you the lead investigator involving the case of Mr. Comeaux?

A Yes.

Q And did your investigation focus on a series of events that occurred on or about April 29th of 2011?

1 A Yes.

2 Q And did those events involve some activity and unrest at the
3 Iberia Parish jail on that day?

4 A Yes.

5 Q And was Mr. Comeaux called to the Iberia Parish jail that
6 day to respond to that unrest?

7 A Yes.

8 Q And what was your understanding of the role Mr. Comeaux and
9 others was to play that day? Was he there to help?

10 A He was there -- Jason Comeaux, the defendant, along with
11 many other officers, responded for a shakedown at the jail.

12 Q All right. And was there one particular inmate at the jail
13 Mr. Comeaux encountered on that day?

14 A Yes.

15 Q That we're focusing on here?

16 A Yes, initials A.D.

17 Q Okay. And did Mr. Comeaux use excessive force against A.D.
18 at the jail?

19 A Yes.

20 Q Is it your understanding that others were present with
21 Mr. Comeaux at the time that happened?

22 A Yes.

23 Q And one of those people was a high ranking official with the
24 Iberia Parish Sheriff's Department?

25 A Yes.

1 Q And what is your understanding of what happened to A.D.?
2 Where was he taken and what happened to him?

3 A During the course of the shakedown, the defendant,
4 Mr. Comeaux, he entered the pod, and he was with the high ranking
5 officials when they entered the pod. That's where they learned
6 that A.D. had been causing trouble. The high ranking official
7 became enraged, and the high ranking official told Mr. Comeaux to
8 take care of A.D. and noted that Comeaux knew what the high
9 ranking IPSO official wanted done to A.D.

10 Q Essentially to rough him up a little?

11 A To punish him, yes.

12 Q Okay. And where was A.D. taken?

13 A He was escorted to the chapel. They escorted him to the
14 chapel because they knew that that was an area that did not have
15 surveillance cameras.

16 Q What happened to A.D. once he got to the chapel?

17 And I can refer your attention to page 3 of the
18 stipulated factual basis, kind of in the middle of the page.

19 A Once inside the chapel, the defendant and other narcotics
20 agents struck A.D. while he was surrounded by officers,
21 compliant, and not presenting a threat to anyone. The defendant
22 used his fists and others used their fists as well as batons on
23 A.D. while A.D. was lying on the chapel floor.

24 Q Was the high ranking Iberia Parish Sheriff's Office official
25 who ordered the assault present during the assault according to

1 the facts of your investigation?

2 A Yes.

3 Q And were other supervisors present as well?

4 A Yes.

5 Q After the assault of A.D., what happened to him?

6 If you'll focus on the bottom of page 3 of the
7 stipulated factual basis.

8 A Yes. A.D. was dragged out of the chapel. He couldn't walk
9 on his own. On the way to the lockdown unit, Comeaux heard A.D.
10 tell the high ranking official who was following the escort that
11 his ribs hurt from being beaten, and the high ranking official
12 responded that nobody had beaten A.D. and that A.D. had been in a
13 fight.

14 Q Are you aware, based on your investigation, that as a result
15 of these activities, some civil lawsuits were brought against
16 Mr. Comeaux and others with the Iberia Parish Sheriff's Office?

17 A Yes.

18 Q And did an official -- did Mr. Comeaux share his story with
19 one of the officials -- a senior official with the Iberia Parish
20 Sheriff's Office about what had happened?

21 A Yes.

22 Q And what happened after he shared that story to your
23 understanding?

24 A Well, after they received notice and he met with the senior
25 official and he told the senior official that he had beaten A.D.

1 in the chapel, the senior official told Comeaux to fix the story.

2 Q And is it your understanding that after that meeting where
3 he was told to fix the story, that Mr. Comeaux and others got
4 together and decided to lie about what happened?

5 A Yes. They -- his impression -- Comeaux's impression was
6 that they wanted him to give false testimony on his role in the
7 beating of A.D.

8 Q Okay. And did Mr. Comeaux coordinate that false testimony
9 with others?

10 A Yes. They conspired to the same story, false story.

11 Q And is it your understanding that Mr. Comeaux met with
12 officials with the Iberia Parish Sheriff's Office as recently as
13 February of 2016 in order to discuss this cover-up and the events
14 surrounding the incident at the jail?

15 A Yes.

16 Q And is it your understanding, based on your investigation
17 and talking to Mr. Comeaux and others, that they were going to
18 misrepresent their roles in the offense in part to keep the facts
19 from coming to light to federal law enforcement about what
20 happened in the jail that day?

21 A Yes.

22 MR. VAN HOOK: May I have a moment, Your Honor?

23 THE COURT: Yes.

24 (Conferring)

25 MR. VAN HOOK: I'll tender the witness, Your Honor.

1 THE COURT: All right. I have no questions.

2 Mr. Billeaud?

3 MR. BILLEAUD: I don't have any questions, Your Honor.

4 THE COURT: All right. You may step down.

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7 Certificate

8 I hereby certify this 15th day of March, 2016, that the foregoing
9 is, to the best of my ability and understanding, a true and
10 correct transcript from the record of proceedings in the
11 above-entitled matter.

12
13 /s/ LaRae E. Bourque

14 Federal Official Court Reporter
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